

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1-19-cv-01301-WMR

**DECLARATION OF SARAH M. MATZ IN SUPPORT OF BELCALIS
MARLENIS ALMÁNZAR’S MOTION TO DISMISS**

SARAH M. MATZ, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:


1. I am an attorney for Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) in this action and submit this declaration in support of Plaintiff’s motion to dismiss the counterclaims of Defendant Latasha Transrina Kebe a/k/a Latasha Transrina Howard (“Kebe”).

2. Annexed hereto as **Exhibit A** is a true and correct copy of a letter dated September 19, 2018, from Damien Granderson, Esq. to Kebe, which was sent to Kebe’s email address at tashakbusiness@gmail.com.

3. Annexed hereto as **Exhibit B** is a true and correct copy of a letter dated Ferbruary 28, 2019, from Gary Adelman, Esq. to Kebe, which was sent to Kebe's email addresses at tashakbusiness@gmail.com and Unwinewithtashak@gmail.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 12, 2019, in New York, New York.



SARAH M. MATZ

EXHIBIT A

**Davis Shapiro Lewit
Grabel Leven Granderson
& Blake, LLP**

150 S Rodeo Drive
Suite 200
Beverly Hills CA 90212
Main 310.248.3400

Damien Granderson
Direct 310.248.3404
dgranderson@davisshapiro.com

September 19, 2018

Via email: tashakbusiness@gmail.com

Re: Cease & Desist Concerning Cardi B

Gentlepersons:

This firm represents the artist professionally known as “Cardi B” (“Artist”). It has come to our attention that you have posted defamatory content about Artist on the following URL controlled by you: <https://www.youtube.com/watch?v=Udi2QomF8jA> (the “Content”).

We demand the immediate removal of the aforementioned Content. The publication of Artist’s image and likeness on the URL controlled by you constitutes violations of, among other laws, the statutory and/or common law rights of privacy and publicity in the various States. Unless you remove the Content immediately, we have been instructed to take all appropriate actions which may include commencing litigation to enforce Artist’s rights, seeking a preliminary injunction and seeking an award of compensatory and punitive damages and reimbursement of all of our costs and attorneys’ fees resulting from these flagrant and intentional violations.

The foregoing is not intended to be a complete statement of the facts or of the law relevant to this matter, nor of Artist’s legal and equitable rights and remedies and nothing hereinabove set forth or omitted shall be deemed a waiver or limitation of any right, remedy or cause of action of any kind whatsoever, all of which are hereby expressly reserved to Artist. Your next step in handling this matter will govern ours.

Sincerely,

Damien Granderson

EXHIBIT B



GARY ADELMAN
PARTNER
SARAH@ADELMANMATZ.COM
DIR: (646) 650-2198

February 28, 2019

VIA ELECTRONIC MAIL

Latasha K. Howard
tashakbusiness@gmail.com;
Unwinewithtashak@gmail.com

Re: Demand for Retraction Concerning Cardi B

Dear Ms. Howard:

We are litigation counsel to Belcalis Almánzar p/k/a Cardi B, (“Client” or “Almánzar”). We write to demand retraction and repudiation of the numerous false and defamatory statements that you have published and distributed regarding Ms. Almánzar in several YouTube videos which you have published on your YouTube channel, “unWinewithTashaK” (“Your Channel”) as well as on your Twitter account, specified below:


Title and URL	Date	Defamatory Statement	Time in Video
Cardi B. DISRESPECTFUL Comedy Skit MOCKING Martin Luther King's Extra Marital Affairs https://www.youtube.com/watch?v=q9iRLqQ6D9I	9/2/2018	That Ms. Almánzar “prostituted for a living”	5:50
Exclusive: Cardi B’s Ex-FRIEND ALLEGES Cardi B. Kept A Huge Box filled with MONISTAT & REVEALS More! https://www.youtube.com/watch?v=Udi2QomF8jA	9/19/2018	You: “You said that Cardi B prostituted” Ms. Jones: “Yes” You: “Was a drug user” Ms. Jones: “Yes” You: “Cocaine and molly to be specific” Ms. Jones: “Yes”.	0:40
Exclusive: Cardi B’s Ex-FRIEND ALLEGES Cardi B. Kept A Huge Box filled with MONISTAT & REVEALS More! https://www.youtube.com/watch?v=Udi2QomF8jA	9/19/2018	You: “She has herpes?” Ms. Jones: “Yes”	0:48

ADELMAN MATZ P.C.

PHONE: (646) 650-2207 • FAX: (646) 650-2108

MAILING:
1173A SECOND AVENUE, SUITE 153
NEW YORK, NEW YORK 10065

OFFICE:
780 THIRD AVENUE, 14TH FLOOR
NEW YORK, NEW YORK 10017

Exclusive: Cardi B's Ex-FRIEND ALLEGES Cardi B. Kept A Huge Box filled with MONISTAT & REVEALS More! https://www.youtube.com/watch?v=Udi2QomF8jA	9/19/2018	You: "So you were living with her at the time and she had herpes outbreaks on her mouth?" Ms. Jones: "Yes"	17:25
Actual PROOF Cardi B. Knew her Ex-Roommate, Drake, Funky Dineva vs Tamar, Beyonce Black Majic https://www.youtube.com/watch?v=q7J_Hc30lSg	9/21/2018	"Everything that we said, that everything that Star said was accurate"	2:11
(The "1/25 Tweet") URL Unavailable	1/25/2019	 <p>In particular, your reference to "#HerpesB"</p>	

The above identified statements (the "Defamatory Statements") are false and constitute defamation per se as well as invasion of privacy placing our client in a false light in the public eye. In addition, the Defamatory Statements are further damaging to Ms. Almánzar's reputation and character within her profession and industry, including but not limited to among her fans, and with prospective business relations.

On behalf of Ms. Almánzar's the demand is hereby made that you immediately:

1. Remove the aforementioned videos from your YouTube Channel, Twitter and any other social media platform or website where you control your content; and
2. Issue a retraction and repudiation of all of the aforementioned Defamatory Statements in your next YouTube video and on Twitter.

If you do not fully comply with the above within three (3) days, Ms. Almánzar will have no choice to pursue all remedy available to her at law or in equity, including but not limited to punitive damages and other remedy available under applicable law.

The foregoing is not intended to be a complete statement of the facts or of the law relevant to this matter, nor of Ms. Almánzar's legal and equitable rights and remedies and nothing hereinabove set forth or omitted shall be deemed a waiver or limitation of any right, remedy or cause of action of any kind whatsoever, all of which are hereby expressly reserved to Ms. Almánzar.

Your next step in handling this matter will govern ours.

Best regards,

A handwritten signature in black ink, appearing to read 'G. Adelman', with a long horizontal flourish extending to the right.

Gary Adelman, Esq.

Cc: Belcalis Almánzar